

EDWARD J. TREDINNICK (#84033)  
GREENE RADOVSKY MALONEY  
SHARE & HENNIGH LLP  
Four Embarcadero Center, Suite 4000  
San Francisco, California 94111-4106  
Telephone: (415) 981-1400  
Facsimile: (415) 777-4961  
E-mail: etredinnick@greeneradovsky.com

Attorneys for Creditor,  
City and County of San Francisco

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

-and-

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Case No.: 19-30088-DM

Chapter 11

**PARTIAL JOINDER OF THE CITY  
AND COUNTY OF SAN FRANCISCO  
TO THE REPLY BRIEF OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS CONCERNING THE  
APPLICABILITY OF INVERSE  
CONDEMNATION**

DATE: November 19, 2019

TIME: 9:30 am

PLACE: Courtroom 17

450 Golden Gate Avenue, 16<sup>th</sup> Fl.

San Francisco, California

JUDGE: Hon. Dennis Montali

RELATED DOCKET NOS: 4485, 4773

The City and County of San Francisco ("**San Francisco**") in the above-captioned chapter 11 cases of Pacific Gas and Electric Company (the "**Utility**") and PG&E Corporation ("**PG&E**") and, together with the Utility, the "**Debtors**"), hereby partially joins, as further described herein, in the

1 Reply Brief of the Official Committee of Tort Claimants Concerning the Applicability of Inverse  
2 Condemnation (the “**Tort Committee Reply**”) [Dkt No. 4773] to the Joint Brief of Debtors and the  
3 Official Committee of Unsecured Creditors and Supplemental Statement of the PG&E Shareholders  
4 Concerning Applicability of Inverse Condemnation [Dkt. No. 4885] (the “**Debtor’s Brief**”).

5 **PARTIAL JOINDER**

6 San Francisco is interested in this issue as a creditor and potential creditor of the Debtors. As  
7 stated in its original objection filed herein [Dkt. No. 3412], San Francisco, along with other public  
8 entities, have a strong interest in ensuring that inverse condemnation continues to apply to privately-  
9 owned utilities so that financial responsibility for the Utility’s actions does not shift to public entities  
10 and property owners.

11 San Francisco specifically joins the Tort Committee Reply with respect to the arguments  
12 presented in Sections IV, A through C (Pages 9-18) that establish the applicability of inverse  
13 condemnation to investor owned utilities under current California case law is settled law that is  
14 binding on PG&E and this Court. San Francisco contends that the Court can end its inquiry there, and  
15 dispose of the issues presented in the Debtor’s Brief without delving into the specifics of California’s  
16 inverse condemnation standard.

17 San Francisco expressly reserves all rights to join in any other parties’ briefing on this issue

18 **CONCLUSION**

19 For the reasons stated herein, San Francisco joins in the arguments set forth in Sections IV, A  
20 through C of the Tort Committee Reply and requests that the Court determine that current California  
21 law regarding the application of inverse condemnation to PG&E applies in this case as set forth in this  
22 Partial Joinder.

23 Respectfully submitted,

24 Dated: November 15, 2019

25 GREENE RADOVSKY MALONEY  
26 SHARE & HENNIGH LLP

27 By: /s/ Edward Tredinnick  
28 Edward J. Tredinnick  
Attorneys for Creditor,  
City and County of San Francisco